



Briefing Paper - Nonrule Policy Document

Nonrule Policy Document Title: Monitored Natural Attenuation for Petroleum Contaminated Sites

Brief Description of Nonrule Policy Document: The Office of Land Quality (OLQ) has developed criteria for evaluating Monitored natural Attenuation (MNA) as a remediation/corrective action option. This nonrule policy document (NPD) uses a stepped approach which is similar to the default/non-default approach used in the Risk Integrated System of Closure (RISC) NPD. This approach provides greater flexibility.

Description of Need for Policy: OLQ, particularly the Leaking Underground Storage Tank Program, received an inordinate amount of corrective action proposals using MNA. On average, the number of corrective action proposals recommending MNA are much higher than those approved.

The following are reasons why this NPD was developed:

- , To improve the quality of corrective action proposals by providing guidance to the responsible parties and consultants regarding evaluation criteria and proposal format;
- , To preserve IDEM and responsible party resources by reducing or eliminating proposals that are incomplete and/or inappropriate;
- , To improve consistency within IDEM regarding the approval of MNA corrective action approvals.

Required Action from Public: This NPD was developed based on a need determined by OLQ staff. It was not in response to external requests.

Other Comments or Issues: In the interest of obtaining comments from external stakeholders, IDEM solicited written comments in June and December of 2001. The final document incorporates a majority of these comments. Attached are copies of the written comments received.

Background Information Utilized: Staff relied on the documents indicated in each of the following categories in developing this nonrule policy document:

Health Criteria

Indiana Department of Environmental Management. February 15, 2001. *Risk Integrated System of Closure - Technical Resource Guidance Document, Final.*

Analytical Methods

U.S. Environmental Protection Agency. Revised 1993. *Methods for Chemical Analysis of Water and Wastes*, Environmental Monitoring and Support Laboratory, EPA-600/4-79-020. Cincinnati, Ohio

Standard Methods for the Examination of Water and Wastewater, 1992. American Public Health Association, American Water Works Association, Water Environment Association, 18th Edition.

Test Methods for Evaluating Solid Waste - Physical/Chemical Methods, EPA SW-846, 3rd Edition, 1986, Update 1, July 1992, Updates II and IIa, 1994, Update III, 1996, and proposed Updates IVa, and proposed IVb, 1998.

Treatment Technology

OLQ Geological Services Technical Memorandum. 1998. *Monitored Natural Attenuation.*

U.S. Environmental Protection Agency. 1999. *Use of Monitored Natural Attenuation at Superfund, RCRA Corrective Action, and Underground Storage Tank Sites*, EPA Directive 9200.4-17P, Office of Solid Waste and Emergency Response. Washington, D.C.

Economic Impact Data

Not applicable.

Environmental Assessment Data

Not applicable

You may contact the Office of Land Quality at 317/234-0974 to view the above documents.

Notice of Comment Period and Public Availability: This NPD is now on file at the Indiana Department of Environmental Management Central File Room, Indiana Government Center North, 100 North Senate Avenue, Room 1201, Indianapolis, IN, Monday through Friday 8:30 a.m. to 4:30 p.m. In addition it will be posted on the agency website <http://www.in.gov/idem/land/pubsforms/guidance/index.html> and mailed to the Solid Waste Board mailing list and other interested parties prior to December 1, 2003. Comments should be sent to the contact person identified below.

Contact: Craig Schroer, Indiana Department of Environmental Management, Office of Land Quality, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, IN 46206-6015, (317) 234-0974, or e-mail cschroer@dem.state.in.us.

Date of Presentation: This NPD is scheduled to be presented at the Solid Waste Management Board Meeting of February 17, 2004, at the Indiana Government Center South, Conference Center Room A, 402 West Washington Street, Indianapolis, IN, 1:30 p.m.